

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
)	No. 18 CR 789-1
)	
v.)	Judge Steven C. Seeger
)	
DENY MITROVICH)	

**GOVERNMENT'S UNOPPOSED
MOTION TO EXONERATE BOND**

The United States of America by its attorney, JOHN R. LAUSCH, JR., United States Attorney of the Northern District of Illinois for its motion, moves as follows:

1. Pursuant to a Pre-Trial Release Order entered on December 19, 2018, Reyna A. Garcia and Deny D. Mitrovich posted their interest in certain real property to secure his release on bond. As a result, the property was encumbered pending the defendant's completion of the bond requirements.

2. As the defendant was convicted, sentenced and has surrendered to the custody of the Bureau of Prisons, the government hereby submits this motion to exonerate the bond. In addition, the government requests that this Court order the release of any liens or other encumbrances lodged against the real property as it relates to this release order and further order that the quit claim deed executed in favor of the United States of America, currently held in the custody of the Clerk of the United States District Court, Northern District of Illinois, be returned to the sureties at the property address.

3. Defendant's counsel has been contacted regarding this motion and counsel has no objection to the motion or the entry of the Order.

WHEREFORE, the government respectfully requests this Court to exonerate the bond posted in this case.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

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